

## REMARKS

Applicants provide a new set of claims. These claims are determined in part by the Examiner's Action, in part by the references cited and in part for the purpose of more clearly setting forth the inventive concept involved.

In order to best understand why Applicants' invention is not taught or suggested by the references either singularly or in combination, Applicants set forth below a summary of Applicants' invention.

Applicants' system provides a simpler and less complex security system than does the art cited by the Examiner. Yet it is a simpler system that provides security adequate for the purpose and has advantages including cost and automatic operation.

It is important to recognize that Applicants' system takes a single serial identification number which is encoded in two separate locations within the hand held electronic reference product. One location is the database file. The other location is in the file management system or in some other portion of the hand held platform. Applicants refer to this underlying item as a "serial identification" in the claims. It is encoded in the database file as a first voucher and it is encoded in the file system or elsewhere as a second voucher.

Because of the simplicity of Applicants' system; certain advantages are obtained, including:

1. There is a minimum cost and minimum usage of programming and file space.

2. It operates transparent to the user. It does not require the user to perform a routine in order to effect the security validation.

3. The user does not require a password.

4. It provides an optimum trade-off of the above features with a degree of security adequate for the purpose.

#### Support in Specification

The claim language has been materially changed. However, Applicants believe that the language that identifies various items and the relationship language finds support in the specification.

The claims make clear that it is a program within the PC reader that reads and compares the two vouchers that are within the hand held product (or platform) so as to provide a validation signal.

Paragraph 0024 indicates that the PC reader will initiate the security validation process prior to accessing the content of the device.

Paragraph 0025 makes clear that in the validation process the PC reader will examine the header of the database to determine what security protocol is implemented.

Claim 18 refers to first and second vouchers. Both vouchers are based on the serial identification number. One of the vouchers is in the database file and one of the keys is outside of the database file. The specification refers to these vouchers in paragraphs 0027 through 0029.

### The Cited Art

The Examiner has rejected claims as being obvious over the combination of the Ishiguro '445 Patent in view of the Chou '444 Patent.

Applicants suggest that the relatively complex, highly secure data control techniques taught by these references, teach away from doing what Applicants teach. What Applicants teach is appropriate for the security required in connection with a hand held portable consumer platform so that the platform database can be accessed by a PC.

Perhaps, among the reasons that enhanced security is required in these references is that, as in Ishiguro, critical data is moved between flash memory and content database. By contrast, Applicants' arrangement permits, upon validation, the PC to read the database of the hand held portable platform. Accordingly, the same level of security is not required as is required in the Ishiguro system and teachings.

Applicants suggest that it is not obvious to selectively take from these references in order to put together the simple, inexpensive, security system adequate for the purpose of dealing with an inexpensive hand held consumer product platform. Of course, the individual features or limitations set forth in Applicants' claims can be picked out of many different references. The invention is in recognizing what combination of features or limitations and relationships are effective for Applicants' purpose. It is only after one has determined what is a minimal set of features that will do the job that one can look back to references and then identify the individual features and limitations that could be said to correspond to individual features and limitations of Applicants' combined invention. But,

what is important is that Applicants' combination, set forth in the claims, is not taught or even suggested by these references.

The Ishiguro '445 Patent would appear at first glance to address similar issues. It is involved with establishing security in the copying of the database of a flash memory into the CPU of a PC. But that "copying" is at the heart of a significant difference.

Ishiguro '445 addresses a system which permits the copying of the content of a flash memory into a PC or other device. When the flash memory is decoupled, the PC retains the memory copied and can process the information that was copied from the flash memory. Thus if music is involved, the musical piece is transferred from the flash memory to the PC. In Ishiguro, it is contemplated that this transfer could occur a number of times. The security to assure that this transfer can only occur between authorized devices calls for a kind of handshaking, a term called mutual authentication in the '445 Patent, that provides, an enhanced degree of security.

By contrast, Applicants' security technique is applicable to a situation where the database is not copied into the memory of the PC. Most importantly, when the platform (hand held portable device) is uncoupled from the PC, the PC can no longer operate with or use the database because the database is not resident in the PC. No copying into the memory of the PC occurs. Applicants believe that a handshake process is not particularly pertinent to develop the security Applicants seek.

Accordingly, in Applicants' design, the two vouchers being compared to provide authentication are both resident in the platform; one voucher in the header of the database and the other voucher elsewhere in the platform. This is different from Ishiguro and simpler than the Ishiguro security routine, yet is adequate for the purpose of Applicants. Part of the reason for the adequacy of this simpler security routine is that it is applied in a situation where the database is not copied into the memory of the PC and where the database is not resident in the memory of the PC when the platform is uncoupled from the PC.

Because of the different context, the handshaking security routine of Ishiguro does not suggest the much simpler security routine of Applicants.

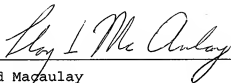
In summary, Applicants have solved a problem in a minimalist and most efficient fashion, avoiding the complexities manifest in the cited references. This appropriate and efficient matching of the solution to the requirements is a hallmark of invention.

It is suggested that industrial progress involves knowing how to get a needed result with less in the way of input complexity and cost.

Accordingly, Applicants believe that the claims in this case are now appropriate for allowance and such is respectfully requested.

The Commissioner for Patents is authorized to charge any additional fees to Deposit Account No. 03-3415.

Respectfully submitted,



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